

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

STATE OF MISSOURI,)
STATE OF GEORGIA,)
STATE OF ALABAMA)
STATE OF ARKANSAS,)
STATE OF FLORIDA,) Civil Action No. 2:24-cv-00103-LGW-BWC
STATE OF NORTH DAKOTA, and)
STATE OF OHIO)
Plaintiffs,)
v.)
UNITED STATES DEPARTMENT OF)
EDUCATION,)
MIGUEL A. CARDONA, in his official)
capacity as Secretary, United States)
Department of Education, and)
JOSEPH R. BIDEN, Jr., in his official)
capacity as President of the United States,)
Defendants.)

MOTION TO SEAL CONTENTS OF EXHIBITS D AND F

Plaintiff States move for permission to seal the contents of Exhibits D and F until final judgment or Defendants consent to unsealing. *See L.R. 79.7.* These exhibits contain documents submitted by Defendants to MOHELA, which Plaintiff States obtained through compulsory legal process. Defendants marked these documents confidential, stating that these materials are “sensitive but unclassified information” and “includ[e] proprietary data, interpretations and/or derivatives of such data provided by the Federal Student Aid (FSA) Contracting Office and/or entities other than the contracting parties.” *See Ex. D at 1.* Plaintiff States move to seal this

information in an abundance of caution, recognizing that Defendants are in the best position to determine any consequences of unsealing.

Date: September 3, 2024

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Respectfully Submitted,

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